



Honesty - Integrity - Character

**Palm Beach County
Commission on Ethics**
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News Release

For immediate release:
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January 6, 2022
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Summary of Palm Beach County Commission on Ethics Meeting Held on January 6, 2022

The Palm Beach County Commission on Ethics (COE) took the following action at its monthly public meeting held on January 6, 2022.

The Executive Director presented the 2021 COE Annual Report to the commissioners.

Two advisory opinions were approved. The full opinions are available at <http://www.palmbeachcountyethtics.com/opinions.htm>.

RQO 21-019: A county employee asked if a conflict of interest exists for her when the owner of the company she works for as an independent contractor in her private capacity (Sterling International) becomes a vendor of the county through a different company that the owner owns (Innovative Group T & D).

The COE opined as follows: Because the two companies are separate entities and the company that she works for as an independent contractor does not have any contracts or transactions for goods or services with the county, as long as she do not enter into any contractual relationships where she would provide goods or services to the county through that contract, a prohibited conflict of interest will not exist for her. However, since both entities are owned by the same sole proprietor, she must also take care that she is not conducting any business or doing any work on behalf of the Innovative Group T & D, especially where she would be indirectly providing any goods or services to the county.

RQO 21-021: The President of Delray Citizens for Delray Police (DCDP) asked if the employees of the Delray Beach Police Department were prohibited from accepting prizes from DCDP for competing in a volleyball tournament.

The COE opined as follows: The Code does not prohibit the employees from attending the tournament and accepting the prizes as long as DCDP is not a vendor of the city, is not a lobbyist or principal or employer of a lobbyist that lobbies the city, and as long as there is no "quid pro quo" or special privilege or treatment given to DCDP by the employees or the city

based on the hosting of this event. In addition, the food, beverages, and prizes from the event may be reportable gifts.

A detailed explanation of all agenda items is available at <http://www.palmbeachcountyethics.com/meetings.htm>.

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